

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Anthony Martinez, Robert Fields, et al. v.  
Zhejiang Huahai Pharmaceuticals Co,  
LTD., et al*, Case No: 1:19-cv-12143-RBK-  
JS

**NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF ROBERT FIELDS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Robert Fields on **March 4, 2021 at 9:00 a.m. EST at 7185 McClean Blvd, Baltimore, MD 21234**. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contacts for the deposition are:

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Date: February 2, 2021

Respectfully submitted,

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*Attorneys for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis LLC,  
and Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of February, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Robert Fields to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on February 2, 2021:

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/s/ Tiffany M. Andras  
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